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Designated Counsel for Ignition Switch Plaintiffs

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

-----X
In re: : Chapter 11
MOTORS LIQUIDATION COMPANY, et al., : Case No.: 09-50026 (REG)
f/k/a General Motors Corp., et al., :
: Debtors. : (Jointly Administered)
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**APPELLANTS' STATEMENT OF ISSUES ON APPEAL AND AMENDED
DESIGNATION OF ITEMS TO BE INCLUDED IN THE RECORD ON APPEAL**

Pursuant to Rule 8009 of the Federal Rules of Bankruptcy Procedure, the Appellants-Ignition Switch Plaintiffs (the “Appellants”),¹ by and through their undersigned counsel, respectfully submit the following: (i) statement of issues to be presented on appeal from the *Judgment*, dated June 1, 2015 [ECF No. 13177] and *Decision on Motion to Enforce Sale Order*, dated April 15, 2015 [ECF No. 13109]; and (ii) amended designation of items to be included in the record on appeal.

¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Judgment or the Decision. As defined in the Judgment, the term “Ignition Switch Plaintiffs” shall mean plaintiffs that have commenced a lawsuit against New GM asserting economic losses based on or arising from the Ignition Switch in the Subject Vehicles (each term as defined in the *Agreed and Disputed Stipulations of Fact Pursuant to the Court’s Supplemental Scheduling Order, Dated July 11, 2014*, filed on August 8, 2014 [ECF No. 12826], at 3).

I. Statement Of Issues To Be Presented On Appeal.

The Appellants submit the following statement of issues on appeal:

1. Did the Bankruptcy Court exceed its jurisdictional authority or otherwise err in holding that the Sale Order may be enforced so as to enjoin claims against New GM based on New GM's own independent, post-Closing acts or conduct?
2. Did the Bankruptcy Court err in entering a Judgment providing for enforcement of the Sale Order by enjoining and barring claims asserted against New GM where such claims "concern[] an Old GM vehicle or part," and through the creation of procedures for staying, striking or dismissing such claims?
3. Did the Bankruptcy Court err in holding that the Ignition Switch Plaintiffs must demonstrate prejudice in order to establish a due process violation in connection with the entry or enforcement of the Sale Order?
4. Did the Bankruptcy Court err in holding that the Ignition Switch Plaintiffs failed to demonstrate prejudice in connection with the entry or enforcement of the Sale Order?
5. Did the Bankruptcy Court err in failing to consider the allegations of New GM's improper concealment of the Ignition Switch Defect in connection with the entry or enforcement of the Sale Order?
6. Did the Bankruptcy Court err by not providing the Ignition Switch Plaintiffs the opportunity for further development of the factual record in connection with the enforcement of the Sale Order, including, without limitation, as to the issue of prejudice, upon the Bankruptcy Court's determination that the Ignition Switch Plaintiffs had to demonstrate such prejudice in order to establish a due process violation in connection with the entry or enforcement of the Sale Order?

7. Did the Bankruptcy Court err in applying the doctrine of equitable mootness to the claims of the Ignition Switch Plaintiffs?

8. Did the Bankruptcy Court err in holding that the rulings in the Decision and the Judgment shall apply to any other plaintiffs not represented by Designated Counsel?

II. Designation Of Items To Be Included In The Record On Appeal.

The Appellants submit the following designation of items to be included in the record on appeal (including any exhibit, annex, or addendum thereto):

| Item No. | Document | Filing Date | ECF No. |
|----------|---|-------------|---------|
| 1 | Motion for Sale of Property under Section 363(b)/Debtors' Motion Pursuant to 11 U.S.C. §§ 105, 363(b), (f), (k), and (m), and 365 and Fed. R. Bankr. P. 2002, 6004, and 6006, to (I) Approve (A) The Sale Pursuant to The Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, A U.S. Treasury-Sponsored Purchaser, Free and Clear of Liens, Claims, Encumbrances, and Other Interests; (B) The Assumption and Assignment of Certain Executory Contracts and Unexpired Leases; and (C) Other Relief; and (II) Schedule Sale Approval Hearing | 6/1/2009 | 92 |
| 2 | Memorandum of Law In Support of Debtors' Motion Pursuant To 11 U.S.C. §§ 105, 363(b), (f), (k), (m) and 365, and Fed. R. Bankr. P. 2002, 6004 and 6006, to (I) Approve (A) The Sale Pursuant to The Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC | 6/1/2009 | 105 |
| 3 | Certificate of Service (First Day Motion Service) | 6/1/2009 | 134 |
| 4 | Order Approving Procedures for Sale of Debtors' Assets Pursuant to The Master Sale and Purchase Agreement with Vehicle Acquisition Holdings LLC, A U.S. Treasury-Sponsored Purchaser, Scheduling Bid Deadline and Sale Hearing Date, Establishing Assumption and Assignment Procedures and Fixing Notice Procedures and Approving Form of Notice | 6/2/2009 | 274 |
| 5 | Notice of Filing of the Amended Master Sale and Purchase Agreement and Certain Exhibits of the Disclosure Schedule Thereto | 6/27/2009 | 2649 |
| 6 | Declaration/Certificate of Publication of Notice of Sale Hearing | 6/29/2009 | 2757 |

| Item No. | Document | Filing Date | ECF No. |
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| 7 | Declaration/Certificate of Publication of Notice of Commencement of Chapter 11 Cases and First Day Hearing | 7/1/2009 | 2910 |
| 8 | Decision on Debtors' Motion for Approval of (1) Sale of Assets to Vehicle Acquisition Holdings LLC; (2) Assumption and Assignment of related Executory Contracts; and (3) Entry Into UAW Retiree Settlement Agreement | 7/5/2009 | 2967 |
| 9 | Order (I) Authorizing Sale of Assets Pursuant to Amended and Restated Master Sale and Purchase Agreement with NGMCO, Inc., a U.S. Treasury-Sponsored Purchaser; (II) Authorizing Assumption and Assignment of Certain Executory Contracts and Unexpired Leases in Connection with the Sale; and (III) Granting Related Relief | 7/5/2009 | 2968 |
| 10 | Errata Order Regarding Decision on Debtors' Motion for Approval of (1) Sale of Assets to Vehicle Acquisition Holdings LLC; (2) Assumption and Assignment of Related Executory Contracts; and (3) Entry Into UAW Retiree Settlement Agreement | 7/6/2009 | 2985 |
| 11 | Transcript regarding Hearing Held on 7/2/09 9:02 AM Regarding Motion of the Debtors for Entry of Order Pursuant to 11 U.S.C. Section 363(b) Authorizing and Approving Settlement Agreements with Certain Unions; Debtors' Motion Pursuant to Bankruptcy Code 105(a), 361, 362, 363, 364, and 507 and Bankruptcy Rule 2002, 4001, and 6004 to Amend DIP Credit Facility; Continuation of GM 363 Sale Hearing | 7/8/2009 | 3062 |
| 12 | Transcript regarding Hearing Held on 6/30/09 10:07 AM Regarding Motion of the Debtors for Entry of Order Pursuant to 11 U.S.C. Section 363(b) Authorizing and Approving Settlement Agreements with Certain Unions; Debtors' Motion Pursuant to Bankruptcy Code 105(a), 361, 362, 363, 364, and 507 and Bankruptcy Rule 2002, 4001, and 6004 to Amend DIP Credit Facility; Continuation of GM 363 Sale Hearing | 7/8/2009 | 3087 |
| 13 | Transcript regarding Hearing Held on 7/1/09 7:59 AM Regarding Motion of the Debtors for Entry of Order Pursuant to 11 U.S.C. Section 363(b) Authorizing and Approving Settlement Agreements with Certain Unions; Debtors' Motion Pursuant to Bankruptcy Code 105(a), 361, 362, 363, 364, and 507 and Bankruptcy Rule 2002, 4001, and 6004 to Amend DIP Credit Facility; Continuation of GM 363 Sale Hearing | 7/15/2009 | 3205 |

| Item No. | Document | Filing Date | ECF No. |
|----------|--|-------------|---------|
| 14 | Debtors' Motion for Order Pursuant to Section 502(b)(9) of the Bankruptcy Code and Bankruptcy Rule 3003(c)(3) Establishing the Deadline for Filing Proofs of Claim (Including Claims Under Section 503(b)(9) of the Bankruptcy Code) and Procedures Relating Thereto and Approving the Form and Manner of Notice Thereof | 9/2/2009 | 3940 |
| 15 | Affidavit of Service of the Notice and Motion for Order Pursuant to Section 502(b)(9) of the Bankruptcy Code and Bankruptcy Rule 3003(c)(3), Establishing the Deadline for Filing Proofs of Claim (Including Claims Under Section 503(B)(9) of the Bankruptcy Code) and Procedures Relating Thereto and Approving the Form and Manner of Notice Thereof | 9/11/2009 | 4020 |
| 16 | Order Establishing the Deadline For Filing Proofs of Claim (Including Claims Under Section 503(b)(9) of the Bankruptcy Code) and Procedures Relating Thereto and Approving the Form and Manner of Notice Thereof | 9/16/2009 | 4079 |
| 17 | Certificate of Publication of the Notice of Deadlines For Filing Proofs of Claim (Including Claims Under Section 503(b)(9) of the Bankruptcy Code (the General Notice) and the Notice of Deadline for Filing Proofs of Claim (the Local Notice)) | 1/5/2010 | 4724 |
| 18 | Affidavit of Publication of Notice of Deadlines for Filing Certain Proofs of Claim | 1/25/2010 | 4877 |
| 19 | Affidavit of Service of 1) Debtors' Joint Chapter 11 Plan and 2) Disclosure Statement for Debtors' Joint Chapter 11 Plan | 9/3/2010 | 6852 |
| 20 | Debtors' Motion for an Order (I) Approving Notice of Disclosure Statement Hearing; (II) Approving Disclosure Statement; (III) Establishing a Record Date; (IV) Establishing Notice and Objection Procedures for Confirmation of the Plan; (V) Approving Solicitation Packages; and Procedures for Distribution Thereof; (VI) Approving the Forms of Ballots and Establishing Procedures for Voting on the Plan; and (VII) Approving the Form of Notices to Non-Voting Classes under the Plan | 9/3/2010 | 6854 |

| Item No. | Document | Filing Date | ECF No. |
|----------|--|-------------|---------|
| 21 | Affidavit of Service of Notice of Hearing on Debtors' Motion for an Order (I) Approving Notice of Disclosure Statement Hearing; (II) Approving Disclosure Statement; (III) Establishing a Record Date; (IV) Establishing Notice and Objection Procedures for Confirmation of the Plan; (V) Approving Solicitation Packages and Procedures for Distribution Thereof; (VI) Approving the Forms of Ballots and Establishing Procedures for Voting on the Plan; and (VII) Approving the Form of Notices to Non-Voting Classes Under the Plan | 9/7/2010 | 6867 |
| 22 | Notice of Certification of Publication of Notice of Hearing to Consider Approval of Debtors' Proposed Disclosure Statement with Respect to Debtors' Joint Chapter 11 Plan | 10/5/2010 | 7239 |
| 23 | Disclosure Statement for Debtors' Amended Joint Chapter 11 Plan | 12/7/2010 | 8014 |
| 24 | Debtors' Amended Joint Chapter 11 Plan | 12/7/2010 | 8015 |
| 25 | Disclosure Statement for Debtors' Amended Joint Chapter 11 Plan | 12/8/2010 | 8023 |
| 26 | Affidavit of Service of Disclosure Statement for Debtors' Amended Joint Chapter 11 Plan and Debtors' Amended Joint Chapter 11 Plan | 12/8/2010 | 8024 |
| 27 | Order Granting Motion (I) Approving Notice Of Disclosure Statement Hearing; (II) Approving Disclosure Statement; (III) Establishing a Record Date; (IV) Establishing Notice and Objection Procedures for Confirmation of the Plan; (V) Approving Notice Packages and Procedures for Distribution Thereof; (VI) Approving the Forms of Ballots and Establishing Procedures for Voting on the Plan; and (VII) Approving the Form of Notices to Non-Voting Classes Under the Plan | 12/8/2010 | 8043 |
| 28 | Affidavit of Service of Disclosure Statement for Debtors' Amended Joint Chapter 11 Plan | 12/10/2010 | 8053 |
| 29 | Affidavit of Publication of the Notice of (I) Approval of Disclosure Statement; (II) Establishment of Record Date; (III) Hearing on Confirmation of the Plan and Procedures for Objecting To Confirmation of the Plan; (IV) Procedures and Deadline for Voting on the Plan; and (V) Administrative Expense Claim Bar Date | 1/18/2011 | 8673 |

| Item No. | Document | Filing Date | ECF No. |
|----------|---|-------------|---------|
| 30 | Amended Affidavit of Publication of Notice of (I) Approval of Disclosure Statement; (II) Establishment of Record Date; (III) Hearing on Confirmation of the Plan and Procedures for Objecting To Confirmation of the Plan; (IV) Procedures and Deadline for Voting on the Plan; and (V) Administrative Expense Claim Bar Date (related document ECF No. 8673) | 1/21/2011 | 8788 |
| 31 | Amended Affidavit of Publication of Notice of (I) Approval of Disclosure Statement; (II) Establishment of Record Date; (III) Hearing on Confirmation of the Plan and Procedures for Objecting To Confirmation of the Plan; (IV) Procedures and Deadline for Voting on the Plan; and (V) Administrative Expense Claim Bar Date (related document ECF No. 8788) | 2/16/2011 | 9277 |
| 32 | Debtors' Second Amended Joint Chapter 11 Plan | 3/18/2011 | 9836 |
| 33 | Affidavit of Service of Debtors' Second Amended Joint Chapter 11 Plan | 3/21/2011 | 9845 |
| 34 | Findings of Fact and Conclusions of Law and Order Pursuant to Sections 1129(A) and (B) of the Bankruptcy Code and Rule 3020 Of The Federal Rules Of Bankruptcy Procedure Confirming Debtors Second Amended Joint Chapter 11 Plan | 3/29/2011 | 9941 |
| 35 | Corrected Notice of Occurrence of Effective Date of Debtors' Second Amended Joint Chapter 11 Plan | 4/6/2011 | 10056 |
| 36 | Notice of (I) Entry of Order Confirming Debtors' Second Amended Joint Chapter 11 Plan and (II) Occurrence of Effective Date | 5/3/2011 | 10151 |
| 37 | Notice of Certification of Publication of the Notice of (I) Entry of Order Confirming Debtors' Second Amended Joint Chapter 11 Plan and (II) Occurrence of Effective Date | 5/10/2011 | 10214 |
| 38 | Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of June 30, 2011 | 8/1/2011 | 10648 |
| 39 | Supplemental Status Report - Supplement to Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of June 30, 2011 | 9/14/2011 | 10874 |
| 40 | Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of September 30, 2011 | 10/28/2011 | 11090 |

| Item No. | Document | Filing Date | ECF No. |
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| 41 | Notice of Proposed Order Approving Motion and Motion Pursuant to Bankruptcy Rule 3003 and Section 105(a) of the Bankruptcy Code for an Order Disallowing Certain Late Filed Claims | 1/26/2012 | 11351 |
| 42 | Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of December 31, 2011 | 1/30/2012 | 11358 |
| 43 | Order Approving Motion Pursuant to Bankruptcy Rule 3003 and Section 105(a) of the Bankruptcy Code Disallowing Certain Late Filed Claims | 2/8/2012 | 11394 |
| 44 | Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction | 4/21/2014 | 12620 |
| 45 | Exhibits to Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction | 4/21/2014 | 12621 |
| 46 | Endorsed Order Regarding Letter Dated April 21, 2014, filed by Arthur Steinberg on behalf of General Motors LLC (ECF No. 12622) | 4/22/2014 | 12627 |
| 47 | Notice of (A) Filing of Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, and (B) Conference to be Held in Connection with Such Motion | 4/22/2014 | 12628 |
| 48 | Objection to Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, filed by Edward S. Weisfelner on behalf of Daniel Ratzlaff, Patricia Barker, Sylvia Benton, Nicole Heuler, Katie Michelle McConnell, Carlota Onofre, and Teleso Satele, individually and as putative class representatives | 4/22/2014 | 12629 |
| 49 | Cover Page and Exhibits to Objection to Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (relates to ECF No. 12629) | 4/23/2014 | 12640 |
| 50 | Motors Liquidation Company GUC Trust Quarterly Section 6.2(c) Report and Budget Variance Report as of March 31, 2014 | 4/24/2014 | 12653 |
| 51 | Supplements to Schedule 1 and Schedule 2 to Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce | 4/30/2014 | 12672 |

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| 52 | Letter to the Honorable Robert E. Gerber Regarding May 2, 2014 Status Conference, filed on behalf of General Motors LLC | 4/30/2014 | 12673 |
| 53 | Amended Notice of (A) Filing of Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, and (B) Conference to be Held in Connection with Such Motion | 5/1/2014 | 12675 |
| 54 | Letter to the Honorable Robert E. Gerber in response to New GM's Letter of 4/30/2014 (ECF No. 12673), filed by Edward S. Weisfelner on behalf of Plaintiffs | 5/1/2014 | 12677 |
| 55 | Notice of Settlement of Scheduling Order Regarding (I) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction; (II) Objection filed by Certain Plaintiffs in Respect Thereto; and (III) Adversary Proceeding No. 14-01929 | 5/12/2014 | 12690 |
| 56 | Objection to Notice of Settlement of Scheduling Order, filed on behalf of Proposed Lead Plaintiffs | 5/15/2014 | 12693 |
| 57 | Reply to Objection to Notice of Settlement of Scheduling Order, filed by Edward S. Weisfelner on behalf of Designated Counsel | 5/15/2014 | 12695 |
| 58 | Scheduling Order Regarding (I) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, (II) Objection Filed by Certain Plaintiffs in Respects Thereto, and (III) Adversary Proceeding No. 14-01929 | 5/16/2014 | 12697 |
| 59 | Second Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction | 5/19/2014 | 12698 |
| 60 | Second Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction | 5/19/2014 | 12699 |
| 61 | Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of March 31, 2014 | 5/23/2014 | 12708 |
| 62 | Third Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction | 6/2/2014 | 12717 |

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| 63 | Third Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction | 6/2/2014 | 12718 |
| 64 | Corrected Third Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction | 6/2/2014 | 12719 |
| 65 | Corrected Third Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction | 6/2/2014 | 12720 |
| 66 | Fourth Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction | 6/13/2014 | 12722 |
| 67 | Fourth Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction | 6/13/2014 | 12723 |
| 68 | Response By General Motors LLC to Establish Stay Procedures for Newly-Filed Ignition Switch Actions, with hearing to be held on July 2, 2014 | 6/13/2014 | 12724 |
| 69 | Notice of Motion of General Motors LLC To Establish Stay Procedures for Newly-Filed Ignition Switch Actions | 6/13/2014 | 12725 |
| 70 | Supplemental Response by General Motors LLC in Connection with Stay Procedures Set Forth in the Court’s May 16, 2014 Scheduling Order | 6/24/2014 | 12735 |
| 71 | Notice of Presentment of Supplemental Scheduling Order Regarding (I) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction, (II) Objection Filed By Certain Plaintiffs in Respect Thereto, and (III) Adversary Proceeding No. 14-01929, filed on behalf of General Motors | 7/1/2014 | 12747 |
| 72 | Letter to the Honorable Robert E. Gerber from Lisa Rubin, on behalf of Wilmington Trust Company as trustee and administrator of GUC Trust, responding to New GM’s Notice of Presentment (ECF No. 12747) | 7/1/2014 | 12753 |

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| 73 | Notice of Presentment of Supplemental Scheduling Order Regarding (I) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, (II) Objection Filed By Certain Plaintiffs in Respect Thereto, and (III) Adversary Proceeding No. 14-01929, filed on behalf of Wilmington Trust Company as trustee and administrator of GUC Trust | 7/1/2014 | 12754 |
| 74 | Letter to the Honorable Robert E. Gerber from Jonathan Flaxer, on behalf of Groman Plaintiffs, Regarding Proposed Counter-Order to Proposed Supplemental Scheduling Order | 7/1/2014 | 12755 |
| 75 | Notice of Presentment of Counter Supplemental Scheduling Order Regarding (I) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, (II) Objection Filed By Certain Plaintiffs in Respect Thereto, and (III) Adversary Proceeding No. 14-01929, filed on behalf of Groman Plaintiffs | 7/1/2014 | 12756 |
| 76 | Order Granting Motion of General Motors LLC to Establish Stay Procedures for Newly-Filed Ignition Switch Actions | 7/8/2014 | 12764 |
| 77 | Supplemental Scheduling Order Regarding (I) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, (II) Objection Filed by Certain Plaintiffs in Respect Thereto, and (III) Adversary Proceeding No. 14-01929 | 7/11/2014 | 12770 |
| 78 | Fifth Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction | 7/21/2014 | 12780 |
| 79 | Fifth Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction | 7/21/2014 | 12781 |
| 80 | Motors Liquidation Company GUC Trust Quarterly Section 6.2(c) Report and Budget Variance Report as of June 30, 2014 | 7/25/2014 | 12786 |
| 81 | Decision with Respect to No Stay Pleading (Phaneuf Plaintiffs) | 7/30/2014 | 12791 |
| 82 | Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce this Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits | 8/1/2014 | 12807 |

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| 83 | Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions) | 8/1/2014 | 12808 |
| 84 | Endorsed Order, Approving General Motors Letter filed on 8/1/2014 (ECF No. 12809) Regarding Proposed Page Limits for Briefs | 8/4/2014 | 12810 |
| 85 | Order Denying the Relief Requested by the Phaneuf Plaintiffs in Their No Stay Pleading | 8/4/2014 | 12811 |
| 86 | Endorsed Order, Adding Matters Raised in New GM August 1, 2014 Letter (ECF No. 12806) to Calendar for August 18 Conference | 8/4/2014 | 12812 |
| 87 | Notice of (A) Filing of (I) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions), and (II) Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce this Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuit, and (B) Conference to be held in Connection with Such Motions on 8/18/2014, filed on behalf of General Motors LLC | 8/4/2014 | 12813 |
| 88 | Decision with Respect to No Stay Pleading and Related Motion to Dismiss for Lack of Subject Matter Jurisdiction (Elliot Plaintiffs) | 8/6/2014 | 12815 |
| 89 | Sixth Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction | 8/7/2014 | 12818 |
| 90 | Sixth Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction | 8/7/2014 | 12819 |
| 91 | Agreed and Disputed Stipulations of Fact Pursuant to the Court's Supplemental Scheduling Order, Dated July 11, 2014 | 8/8/2014 | 12826 |
| 92 | Letter to the Honorable Robert E. Gerber from Arthur Steinberg on behalf of General Motors LLC, Pursuant to July 11, 2014 Supplemental Scheduling Order Regarding Agreed Upon & Disputed Stipulations of Fact | 8/8/2014 | 12827 |

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| 93 | Order Denying the Relief Requested in Plaintiffs Lawrence and Celestine Elliott's No Stay Pleading Pursuant to the Court's Scheduling Orders and Motion for Order of Dismissal for Lack of Subject Matter Jurisdiction Pursuant to Bankr. R. 7012(b) and for Related Relief | 8/12/2014 | 12834 |
| 94 | Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of June 30, 2014 | 8/13/2014 | 12838 |
| 95 | Seventh Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction | 8/14/2014 | 12843 |
| 96 | Seventh Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction | 8/14/2014 | 12844 |
| 97 | Letter to the Honorable Robert E. Gerber from Sander L. Esserman on behalf of Designated Counsel, Regarding Threshold Issues | 8/15/2014 | 12854 |
| 98 | Letter to the Honorable Robert E. Gerber from Daniel Golden on behalf of Akin Gump Strauss Hauer & Feld LLP, Regarding Threshold Issues Letters | 8/15/2014 | 12856 |
| 99 | "Limited" No Stay Pleading, filed on behalf of the People of the State of California | 8/19/2014 | 12862 |
| 100 | Endorsed Order, Approving Briefing Schedule Proposed in 8/21/2014 New GM Letter Regarding Four Threshold Issues (related document ECF No. 12867) | 8/22/2014 | 12869 |
| 101 | Response by General Motors LLC to the "Limited" No Stay Pleading Filed by the Orange County Plaintiff in Connection with the Court's July 8, 2014 Order Establishing Stay Procedures for Newly-Filed Cases, filed on behalf of General Motors LLC | 8/29/2014 | 12876 |
| 102 | Letter to the Honorable Robert E. Gerber from Arthur Steinberg on behalf of General Motors LLC, Regarding Revised Scheduling Orders and Stay Stipulations In Connection With Additional Motions to Enforce | 9/10/2014 | 12890 |
| 103 | Scheduling Order Regarding Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce this Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits | 9/15/2014 | 12897 |

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|------------|--|-------------|---------|
| 104 | Scheduling Order Regarding Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions) | 9/15/2014 | 12898 |
| 105 | Transcript of August 18, 2014 Hearing Regarding Threshold Issues Letters, filed pursuant to the Supplemental Scheduling Order, Dated July 11, 2014 | 8/21/2014 | 12899 |
| 106 | Eighth Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction | 9/18/2014 | 12906 |
| 107 | Eighth Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction | 9/18/2014 | 12907 |
| 108 | Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions) | 9/18/2014 | 12908 |
| 109 | Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions) | 9/18/2014 | 12909 |
| 110 | Errata Order Regarding Decision with Respect to No Stay Pleading (Phaneuf Plaintiffs) (ECF No. 12791) | 10/2/2014 | 12934 |
| 111 | Ninth Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction | 10/6/2014 | 12938 |
| 112 | Ninth Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction | 10/6/2014 | 12939 |
| 113 | Second Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions) | 10/6/2014 | 12940 |

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| 114 | Second Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions) | 10/6/2014 | 12941 |
| 115 | Supplement to the Chart of Pre-Closing Accident Lawsuits Set Forth in the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits | 10/6/2014 | 12942 |
| 116 | Tenth Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction | 10/15/2014 | 12950 |
| 117 | Tenth Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction | 10/15/2014 | 12951 |
| 118 | Motors Liquidation Company GUC Trust Quarterly Section 6.2(c) Report and Budget Variance Report as of September 30, 2014 | 10/24/2014 | 12963 |
| 119 | Eleventh Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction | 11/5/2014 | 12976 |
| 120 | Eleventh Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction | 11/5/2014 | 12978 |
| 121 | Third Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions) | 11/5/2014 | 12979 |
| 122 | Third Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions) | 11/5/2014 | 12980 |
| 123 | Opening Brief by General Motors LLC on Threshold Issues Concerning its Motions to Enforce the Sale Order and Injunction | 11/5/2014 | 12981 |

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| 124 | Appendix of Exhibits for Opening Brief by General Motors LLC on Threshold Issues Concerning its Motions to Enforce the Sale Order and Injunction | 11/5/2014 | 12982 |
| 125 | Consolidated Class Action Complaint Against New GM for Recalled Vehicles Manufactured By Old GM and Purchased Before July 11, 2009 or Later, <u>In re General Motors LLC Ignition Switch Litigation</u> , No. 14-MD-2543 (JMF) (S.D.N.Y. Oct. 14, 2014) (ECF No. 347) | 11/5/2014 | 12982-13 |
| 126 | Consolidated Complaint Concerning All GM-Branded Vehicles that were Acquired July 11, 2009 or Later, <u>In re General Motors LLC Ignition Switch Litigation</u> , No. 14-MD-2543 (JMF) (S.D.N.Y. Oct. 14, 2014) (ECF No. 345) | 11/5/2014 | 12982-14 |
| 127 | The Participating Unitholders' and GUC Trust Administrator's Opening Memorandum of Law Respecting the Equitable Mootness Threshold Issue | 11/5/2014 | 12983 |
| 128 | Declaration of Deborah J. Newman in Support of the Participating Unitholders' and GUC Trust Administrator's Opening Memorandum of Law Respecting the Equitable Mootness Threshold Issue | 11/5/2014 | 12984 |
| 129 | Written Opinion signed on 11/10/2014 Regarding Decision with Respect to No Stay Pleading, and Related Motion for Abstention Regarding Sesay Plaintiffs | 11/10/2014 | 12989 |
| 130 | GUC Trust Quarterly GUC Trust Report as of September 30, 2014 | 11/12/2014 | 12997 |
| 131 | Transcript of Hearing Held on 7/2/2014 9:46 AM Regarding "No Stay Pleadings" filed in Connection with Scheduling Order Regarding (I) Motion of General Motors, LLC Pursuant to 11 U.S.C. Sections 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction, and (II) Objection Filed by Certain Plaintiffs in Respect Thereto, and (III) Adversary Proceeding No. 14-01929 (ECF No. 12697) | 11/11/2014 | 13001 |
| 132 | Transcript of Hearing Held on 8/5/2014 9:49 AM Regarding Plaintiffs Lawrence and Celestine Elliott's No Stay Pleading Pursuant to the Court's Scheduling Orders and Motion for Order of Dismissal for lack of subject matter jurisdiction pursuant to Bankr. R. 7012(B) and for related relief | 11/21/2014 | 13003 |

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| 133 | Twelfth Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction | 12/1/2014 | 13009 |
| 134 | Twelfth Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction | 12/1/2014 | 13010 |
| 135 | Fourth Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions) | 12/1/2014 | 13011 |
| 136 | Fourth Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions) | 12/1/2014 | 13012 |
| 137 | Thirteenth Supplement to Schedule “1” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction | 12/8/2014 | 13016 |
| 138 | Thirteenth Supplement to Schedule “2” to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court’s July 5, 2009 Sale Order and Injunction | 12/8/2014 | 13017 |
| 139 | Responsive Brief of Designated Counsel for Pre-Closing Accident Plaintiffs on Threshold Issues Concerning New GM’s Motions to Enforce the Sale Order and Injunction | 12/16/2014 | 13021 |
| 140 | Response by General Motors LLC Regarding the Equitable Mootness Threshold Issue | 12/16/2014 | 13024 |
| 141 | Designated Counsel’s Opposition to New GM’s Motions for Enforcement of Sale Order and Injunction | 12/16/2014 | 13025 |
| 142 | Declaration of Edward S. Weisfelner in Support of Designated Counsel’s Opposition to New GM’s Motions for Enforcement of Sale Order and Injunction | 12/16/2014 | 13026 |
| 143 | Anton R. Valukas, Report to Board of Directors of General Motors Company Regarding Ignition Switch Recalls, dated May 29, 2014 | 12/16/2014 | 13026-2 |

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| 144 | Consent Order, In re TQ14-001 NHTSA Recall No. 14V-047 (U.S. Dep't of Transp. May 16, 2014) | 12/16/2014 | 13026-4 |
| 145 | Declaration of Steve W. Berman in Support of Designated Counsel's Opposition to New GM's Motions for Enforcement of Sale Order and Injunction | 12/16/2014 | 13027 |
| 146 | The Groman Plaintiffs' Response to that Part of New GM's Opening Brief Regarding the "Fraud on the Court Legal Standard" | 12/16/2014 | 13028 |
| 147 | Designated Counsel's Response to the Participating Unitholders' and GUC Trust Administrator's Opening Memorandum of Law Respecting the Equitable Mootness Threshold Issue | 12/16/2014 | 13029 |
| 148 | Response of GUC Trust Administrator and Participating Unitholders to New GM's Opening Brief on Threshold Issues Concerning its Motions to Enforce the Sale Order and Injunction | 12/16/2014 | 13030 |
| 149 | Declaration of Lisa H. Rubin, Esq. | 12/16/2014 | 13031 |
| 150 | Corrected Exhibit 14 to the Declaration of Lisa Rubin, Esq. | 12/17/2014 | 13032 |
| 151 | Fourteenth Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction | 12/24/2014 | 13038 |
| 152 | Fourteenth Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction | 12/24/2014 | 13039 |
| 153 | Administrative Order Signed on 1/13/2015 Regarding Oral Argument on the Motion to Enforce and Related Matters | 1/13/2015 | 13044 |
| 154 | The Participating Unitholders' and GUC Trust Administrator's Reply Memorandum of Law Respecting the Equitable Mootness Threshold Issue | 1/16/2015 | 13047 |
| 155 | Reply Brief by General Motors LLC on Threshold Issues Concerning its Motions to Enforce the Sale Order and Injunction | 1/16/2015 | 13048 |
| 156 | Appendix of Exhibits to Reply Brief By General Motors LLC on Threshold Issues Concerning Its Motions To Enforce the Sale Order and Injunction | 1/16/2015 | 13049 |

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| 157 | Motors Liquidation Company GUC Trust Quarterly Section 6.2(c) Report and Budget Variance Report as of December 31, 2014 | 1/20/2015 | 13051 |
| 158 | Endorsed Order Signed on 1/28/2015 Regarding Overall Time Requests and Proposed Sequence of Oral Argument | 1/28/2015 | 13059 |
| 159 | Second Supplement to the Chart of Pre-Closing Accident Lawsuits set Forth in the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits | 1/28/2015 | 13060 |
| 160 | Endorsed Order Signed on 1/30/2015 Regarding Letter to the Honorable Robert E. Gerber Pursuant to January 28, 2015 Endorsed Order Regarding Oral Argument and Related Matters (ECF No. 13064) | 1/30/2015 | 13066 |
| 161 | Letter to the Honorable Robert E. Gerber in accordance with the Court's Administrative Order, entered on January 13, 2015 [ECF No. 13044], First Endorsed Order, entered on January 28, 2015 [ECF No. 13059], and Second Endorsed Order, entered on January 30, 2015 [ECF No. 13066], filed on behalf of The People of the State of California | 2/2/2015 | 13072 |
| 162 | Response to Letter, dated February 2, 2015, Submitted by the State of California Regarding Oral Argument (ECF No. 13072) | 2/3/2015 | 13073 |
| 163 | Endorsed Order Signed on 2/9/2015 Regarding Letter Filed on behalf of The People of the State of California (ECF No. 13072) | 2/9/2015 | 13078 |
| 164 | Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of December 31, 2014 | 2/12/2015 | 13082 |
| 165 | Third Supplement to the Chart of Pre-Closing Accident Lawsuits set Forth in the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits | 2/13/2015 | 13083 |
| 166 | Transcript Regarding Hearing Held on 2/18/2015 9:00 AM Regarding Oral Argument on Motion to Enforce | 2/20/2015 | 13096 |
| 167 | Fourth Supplement to the Chart of Pre-Closing Accident Lawsuits set Forth in the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits | 3/23/2015 | 13097 |

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| 168 | Fifth Supplement to the Chart of Pre-Closing Accident Lawsuits set Forth in the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits | 4/15/2015 | 13108 |
| 169 | Decision on Motion to Enforce Sale Order | 4/15/2015 | 13109 |
| 170 | Motors Liquidation Company GUC Trust Quarterly Section 6.2(c) Report and Budget Variance Report as of March 31, 2015 | 4/22/2015 | 13118 |
| 171 | Sixth Supplement to the Chart of Pre-Closing Accident Lawsuits set Forth in the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction Against Plaintiffs in Pre-Closing Accident Lawsuits | 4/28/2015 | 13122 |
| 172 | Fifth Supplement to Schedule "1" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions) | 4/28/2015 | 13123 |
| 173 | Fifth Supplement to Schedule "2" to the Motion of General Motors LLC Pursuant to 11 U.S.C. §§ 105 and 363 to Enforce the Court's July 5, 2009 Sale Order and Injunction (Monetary Relief Actions, Other than Ignition Switch Actions) | 4/28/2015 | 13124 |
| 174 | Joint Letter on Behalf of GUC Trust and the GUC Trust Unitholders (Regarding Proposed Form of Judgment) | 5/12/2015 | 13135 |
| 175 | Letter Regarding Proposed Judgment in Connection to Decision On Motion To Enforce Sale Order, filed by New GM | 5/12/2015 | 13136 |
| 176 | Joint Letter Enclosing Proposed Judgment of Co-Designated Counsel and Counsel for Economic Loss Plaintiffs and Designated Counsel and Counsel for Ignition Switch Pre-Closing Accident Plaintiffs in Response to April 15, 2015 Decision (ECF No. 13109) and Endorsed Order, dated May 5, 2015 (ECF No. 13131) | 5/12/2015 | 13137 |
| 177 | Amended and Restated Exhibits 2 and 3 to Letter Regarding Proposed Judgment In Connection To Decision On Motion To Enforce Sale Order, filed by New GM | 5/12/2015 | 13139 |
| 178 | Letter Regarding Proposed Judgment, filed on behalf of Groman Plaintiffs | 5/12/2015 | 13141 |

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| 179 | Status Report/Motors Liquidation Company GUC Trust Quarterly GUC Trust Reports as of March 31, 2015 | 5/22/2015 | 13158 |
| 180 | Decision RE: Form of Judgment | 5/27/2015 | 13162 |
| 181 | Order RE: Technical Matters Concerning Judgment | 5/27/2015 | 13163 |
| 182 | Letter to the Honorable Robert E. Gerber Regarding Technical Matters Concerning Judgment, filed by Gary Peller on behalf of Elliot Plaintiffs | 5/29/2015 | 13169 |
| 183 | Letter to the Honorable Robert E. Gerber Regarding Technical Matters Concerning Proposed Judgment, filed by Arthur Steinberg on behalf of General Motors LLC | 5/29/2015 | 13171 |
| 184 | Letter to the Honorable Robert E. Gerber Regarding Technical Matters Concerning Proposed Judgment, filed by William Weintraub on behalf of Ignition Switch Plaintiffs in Pre-Closing Accident Lawsuits | 5/29/2015 | 13172 |
| 185 | Letter to the Honorable Robert E. Gerber Regarding Technical Matters Concerning Proposed Judgment, filed by Lisa Rubin on behalf of Wilmington Trust Company | 5/29/2015 | 13173 |
| 186 | Letter to the Honorable Robert E. Gerber Regarding Certification of Direct Appeal/Request for Procedural Stay, filed by Arthur Steinberg on behalf of General Motors LLC | 5/29/2015 | 13174 |
| 187 | Letter to the Honorable Robert E. Gerber Responding to Letter Filed by Gary Peller, dated May 29, 2015 (ECF No. 13169), filed by Arthur Steinberg on behalf of General Motors LLC | 6/1/2015 | 13176 |
| 188 | Judgment | 6/1/2015 | 13177 |
| 189 | Order Certifying Judgment for Direct Appeal to Second Circuit | 6/1/2015 | 13178 |
| 190 | Amended Notice of Appeal, filed on behalf of Elliot Plaintiffs | 6/1/2015 | 13179 |
| 191 | Amended Notice of Appeal, filed on behalf of Sesay Plaintiffs | 6/1/2015 | 13180 |
| 192 | Notice of Appeal, filed on behalf of Ignition Switch Plaintiffs | 6/2/2015 | 13185 |
| 193 | Notice of Appeal, filed on behalf of Pre-Closing Accident Plaintiffs | 6/10/2015 | 13194 |
| 194 | Notice of Cross-Appeal, filed on behalf of General Motors LLC | 6/12/2015 | 13200 |

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| 195 | Notice of Cross-Appeal, filed on behalf of Wilmington Trust Company | 6/15/2015 | 13204 |
| 196 | Notice of Appeal, filed on behalf of Groman Plaintiffs | 6/16/2015 | 13209 |
| 197 | Transcript for Hearing Held on 5/2/2014 at 9:46 AM Regarding Status Conference, <u>Groman, et al. v. General Motors LLC (In re Motors Liquidation Corp.)</u> , Case No. 09-50026, Adv. Pro. No. 14-01929 (Bankr. S.D.N.Y. April 21, 2014) (ECF No. 16), attached hereto as <u>Exhibit 1</u> | | |
| 198 | Transcript Regarding Hearing Held on 2/17/2015 9:00 AM Regarding Oral Argument on Motion to Enforce, attached hereto as <u>Exhibit 2</u> | | |
| 199 | MDL Order No. 13 (Organization of Plaintiffs' Counsel, Protocols for Common Benefit Work and Expenses), <u>In re General Motors LLC Ignition Switch Litigation</u> , Case No. 14-md-2543 (JMF) (S.D.N.Y. Sept. 16, 2014) (ECF No. 304), attached hereto as <u>Exhibit 3</u> | | |
| 200 | Notice of Errata and Correction to the Consolidated Class Action Complaint Against New GM for Recalled Vehicles Manufactured by Old GM and Purchased Before July 11, 2009, <u>In re General Motors LLC Ignition Switch Litigation</u> , No. 14-MD-2543 (S.D.N.Y. Nov. 3, 2014) (ECF No. 379), attached hereto as <u>Exhibit 4</u> | | |
| 201 | House of Representatives, Subcommittee on Oversight and Investigations, Committee on Energy and Commerce, <i>The GM Ignition Switch Recall: Why Did It Take So Long?</i> Transcript (Washington, D.C. April 1, 2014) (" <u>Apr. 1 Cong. Hr'g</u> "), attached hereto as <u>Exhibit 5</u> | | |
| 202 | Apr. 1 Cong. Hr'g, Doc. 8 (GMHEC000001727-41), attached hereto as <u>Exhibit 6</u> | | |
| 203 | Apr. 1 Cong. Hr'g, Doc. 9 (GMHEC000001742-54), attached hereto as <u>Exhibit 7</u> | | |
| 204 | Apr. 1 Cong. Hr'g, Doc. 12 (December 2005 Service Bulletin No. 05-02-35-007), attached hereto as <u>Exhibit 8</u> | | |
| 205 | General Motors Company, GM Redoubles Safety Efforts, Announces New Recalls (Form 8-K Exhibit 99.1) (March 17, 2014), attached hereto as <u>Exhibit 9</u> | | |

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| 206 | General Motors Company, GM Announces 5 Safety Recalls (Form 8-K Exhibit 99.1) (May 15, 2014), attached hereto as <u>Exhibit 10</u> | | |
| 207 | General Motors Company, GM Will Rework or Replace Keys on 3.16 Million U.S. Cars (Form 8-K Exhibit 99.1) (June 16, 2014), attached hereto as <u>Exhibit 11</u> | | |
| 208 | General Motors Company, GM Announces Six Safety Recalls (Form 8-K Exhibit 99.1) (June 30, 2014), attached hereto as <u>Exhibit 12</u> | | |
| 209 | General Motors Company, Annual Report (for the fiscal year ended December 31, 2009) (Form 10-K) (April 7, 2010), attached hereto as <u>Exhibit 13</u> | | |
| 210 | General Motors Company, Annual Report (for the fiscal year ended December 31, 2010) (Form 10-K) (March 1, 2011), attached hereto as <u>Exhibit 14</u> | | |
| 211 | General Motors Company, 2010 Annual Report, dated March 1, 2011, attached hereto as <u>Exhibit 15</u> | | |
| 212 | General Motors Company, 2011 Annual Report, dated February 27, 2012, attached hereto as <u>Exhibit 16</u> | | |
| 213 | General Motors Company, 2012 Annual Report, dated February 15, 2013, attached hereto as <u>Exhibit 17</u> | | |
| 214 | General Motors Company, 2013 Annual Report, dated February 6, 2014, attached hereto as <u>Exhibit 18</u> | | |
| 215 | Motors Liquidation Company GUC Trust, Initial Distribution (Form 8-K) (dated April 21, 2011, filed April 27, 2011), attached hereto as <u>Exhibit 19</u> | | |
| 216 | Motors Liquidation Company GUC Trust, Current Report (Form 8-K) (May 16, 2014), attached hereto as <u>Exhibit 20</u> | | |
| 217 | Motors Liquidation Company GUC Trust, Annual Report (for the fiscal year ended March 31, 2014) (Form 10-K) (May 22, 2014), attached hereto as <u>Exhibit 21</u> | | |

Dated: July 14, 2015
New York, New York

Respectfully submitted,

BROWN RUDNICK LLP

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